REMARKS

Claims 1 and 16 have been amended. No claims have been cancelled or added. Claims 9 – 16 and 23 – 30 have been withdrawn from consideration. Hence, claims 1 – 7 and 16 – 22 are pending in the Application.

As a preliminary matter, Applicant affirms the provisional election of group 1.

SUMMARY OF REJECTIONS/OBJECTIONS

The drawings have been objected to because they fail to show a logical flow path for each of the process determination steps.

The specification is "objected" under 35 U.S.C. 112, first paragraph, as lacking an adequate written description.

Claims 1 – 7 and 16 – 22 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particular point out and distinctly claim the subject matter which applicant regards as the invention. Claims 1 and 16 have been amended to address this rejection. Removal of the rejection is respectfully requested.

Claims 1 – 6 and 16 – 21 are rejected under 35 USC 102(b) as being anticipated by U.S. Patent No. 5,454,108, herein Devarakonda.

Claims 7 and 22 have been rejected under 35 USC 103(a) as being unpatentable over Devarakonda in further view of U.S. Patent No. 5,285,528, referred to as Hart.

Objection to Drawings

FIG. 3 has been amended to clarify the conditions under which a particular flow path is undertaken after step 304, 320, and 330. It is respectfully submitted the drawing shows more than detail of sufficient importance. Removal of the objection is respectfully requested.

Objection to Specification

Applicant has thoroughly reviewed the Office Action and is not confident that the Applicant fully comprehends the basis of this objection. As best as Applicant understands, the Office Alleges that to "be effective in showing possession of the invention, an incorporation by b-tree model by reference must be specific as to what portion of the model is being incorporated to constitute a semantic response to lock requests in order to reduce the ambiguous citation of the instant invention, for example, Page 17, lines 13 – 14." Page 17, lines 12 – 14 of the application cite:

> The lock request may be denied when in fact there is no longer a block split operation being performed on the block and no need to deny lock requests on the block.
> To avoid this situation, a lock request may specify that the resource for which a lock is

These lines refer to a block split operation that is performed in a model of the b-tree. The application, rather than just mentioning a block split operation, describes an example of a block split operation at page 5, lines 19 – 25. The specification is not just merely incorporating by reference an aspect of the b-tree model, the specification explains and specifies this aspect. Thus, the basis of the Office Action's objection that the application is ineffective in showing possession of the invention, which is that the application it is not specific as to what portion of the b-tree model is incorporated, is not correct.

Rejection of Claims 1 and 16 under 35 USC 102

Claims 1 and 16, recite:

a first requester transmitting to a lock management system a first request for a

particular lock on a resource;...

determining said first request cannot be honored because of a blocking condition;

in response to determining said first request cannot be honored:

    creating first data that indicates the blocking condition; and

    after creating said first data:

        storing in a store, as a new item of data in the store, said first data,

        and

        transmitting from said lock management system a message that

            indicates that said first request to lock a resource is

            denied;...

Claims 1 and 16 recite features not suggested in any way much less disclosed by the cited art. For example, claims 1 and 16 require "in response to determining said first request [for a lock on a resource] cannot be honored" "because of a blocking condition", "creating first data that indicates the blocking condition" and then "storing in a store, as a new item of data in the store, said first data". Thus, claims 1 and 16 require storing in a store a new item of data that indicates a blocking condition, where the storing of the new data item is triggered by (i.e. is a response to) determining that a request for a lock on resource cannot be honored because of the blocking condition. Devarakonda fails to suggest in any way this feature much less disclose this feature.

Apparently, the Office Action has equated the locks of claim 1 to the tokens of Devarakonda, and the first data that indicates the blocking condition to the "list (a 'copyset') of the local lock managers with conflicting tokens in Devarakonda." Even if the first data may be correlated to a copyset in this way, Devarakonda fails to suggest in any way much disclose the above highlighted feature of claims 1 and 16.

Claims 1 and 16 require that the first data be both created and stored as a new data item in a store in response to determining that a first request for a lock cannot be honored

because of a blocking condition. In Devarakonda, the copyset is created and stored in a local state table as a new data item and/or updated within the local state table when granting a lock request, not when denying a lock request, as explained in the following passages.

A functional block diagram of the lock control server 112 is shown in FIG. 10. Each LCS includes a lock state table 1004, which is formed in the processing node's random access memory. Each entry in the local state table 1004 includes three fields. The token ID field identifies a token. The mode field indicates the mode (read, write or transition) of the token. The **copyset field contains the list of processing nodes that have been granted the token**.

When a lock request message is received by the LCS, the lock state comparator 1002 checks the lock state table 1004 to see if the token can be granted. If the token can be granted then the lock state comparator signals the state table update block 1008, which updates the lock state table accordingly. The state table update block 1008 then sends an OK message to the requesting LLM. (col. 4, line 60 – col. 5, line 7)

Furthermore, there would be no need or motivation to store a new data item in the lock state table when denying a lock request. The copyset in the copy list field already contains the holders of tokens.

Based on the foregoing, claims 1 and 16 are not anticipated or obvious over the cited art. Therefore, claims 1 and 16 are patentable. Reconsideration and allowance of claims 1 and 16 is respectfully requested.

Remaining Dependant Claims

The pending claims not discussed so far are dependant claims that depend on an independent claim that is discussed above. Because each of the dependant claims include the limitations of claims upon which they depend, the dependant claims are patentable for at least those reasons the claims upon which the dependant claims depend are patentable.

Removal of the rejections with respect to the dependant claims and allowance of the dependant claims is respectfully requested. In addition, the dependent claims introduce additional limitations that independently render them patentable. Due to the fundamental difference already identified, a separate discussion of those limitations is not included at this time.

For the reasons set forth above, Applicant respectfully submits that all pending claims are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all claims is hereby respectfully solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Respectfully submitted,

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